

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

LASHEENA SIPP-LIPSCOMB et al.

Plaintiffs,

vs.

No. 2:20-cv-01926

EINSTEIN PHYSICIANS PENNYPACK
PEDIATRICS, et al.

Defendants.

ST. CHRISTOPHER'S HEALTHCARE LLC DEFENDANTS
PROPOSED VERDICT SHEET

The Court will now distribute to each of you a verdict form containing specific questions. At the conclusion of your deliberations, one copy of this should be signed by your foreperson and handed to the court clerk; this will constitute your verdict. The verdict form reads as follows:

QUESTION 1

Do you find that Defendants were negligent in the care and treatment of Minor Plaintiff?

PennyPack Pediatrics	Yes_____	No_____
St. Christopher's Hospital for Children.	Yes_____	No_____
Hayley Bartkus	Yes_____	No_____
Erin E. Hassel, M.D.	Yes_____	No_____
Pramath Nath, M.D.	Yes_____	No_____
Urology for Children	Yes_____	No_____
Charles Concodora, M.D.	Yes_____	No_____
Eric Cho, M.D.	Yes_____	No_____
Arjun Kalyanpur, M.D.	Yes_____	No_____
Teleradiology Solutions, PC	Yes_____	No_____

If you answer Question 1 “Yes” as to any Defendants proceed to answer Question 2 only for the Defendants you answered “Yes” for. If you answered Question 1 “No” as to all the defendants, please return to the courtroom.

QUESTION 2

Was the negligence of Defendants a factual cause of harm to Minor Plaintiff?

PennyPack Pediatrics	Yes_____	No_____
St. Christopher’s Hospital for Children.	Yes_____	No_____
Hayley Bartkus .	Yes_____	No_____
Erin E. Hassel, M.D.	Yes_____	No_____
Pramath Nath, M.D.	Yes_____	No_____
Urology for Children	Yes_____	No_____
Charles Concodora, M.D.	Yes_____	No_____
Eric Cho, M.D.	Yes_____	No_____
Arjun Kalyanpur, M.D.	Yes_____	No_____
Teleradiology Solutions, PC	Yes_____	No_____

If you answered Question 2 “No” for all defendants, you should not answer any further questions and should return to the courtroom. If you answered “Yes” as to two or more Defendants then proceed to Question 3. If you answered “Yes” for only one Defendant, then proceed to Question 4.

QUESTION 3

If your answers to Questions 1 and 2 are “Yes” as to more than one Defendant, taking the combined negligence that was a factual cause in bringing about Plaintiff’s harm as 100%, what percentage of the causal negligence was attributable to the Defendants you have found to be causally negligent?

PennyPack Pediatrics	_____ %
St. Christopher’s Hospital for Children.	_____ %
Hayley Bartkus .	_____ %
Erin E. Hassel, M.D.	_____ %
Pramath Nath, M.D.	_____ %
Urology for Children	_____ %
Charles Concodora, M.D.	_____ %

Eric Cho, M.D.	_____ %
Arjun Kalyanpur, M.D.	_____ %
Teleradiology Solutions, PC	_____ %

Proceed to Question 4.

QUESTION 4

State the total amount of damages, if any, sustained by Plaintiff(s):

\$ _____

Jury Foreperson

Date: _____

CERTIFICATE OF SERVICE

I, Edvard L. Wilson, Esquire, counsel for the St. Christopher's Healthcare, LLC Defendants, hereby certify that a true and correct copy of the foregoing Proposed Verdict Sheet was served upon all counsel of record via the Court's electronic filing system on January 13, 2023.

Edvard L. Wilson

Edvard L. Wilson